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16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 KATHRYN MAYORGA,
 19 Plaintiff,
 20 vs.
 21 CRISTIANO RONALDO,
 22 Defendant.

23 Case No. 2:19-cv-00168-JAD-DJA

24 **STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANT
TO FILE REPLIES AND AN
OPPOSITION RE: ECF NOS. 111, 113,
123, 124 AND 126
(FIRST REQUEST FOR EXTENSION)**

25 Plaintiff, Kathryn Mayorga, by and through her attorneys, Stovall & Associates,
 26 Defendant, Cristiano Ronaldo, by and through his attorneys, Christiansen Trial Lawyers,
 27 (collectively referred to as the “PARTIES”) enter into the following stipulation and proposed
 28 order to allow Defendant Ronaldo an extension of the time in which to file reply briefs in support
 of Defendant’s Emergency Motion for Case Terminating Sanctions and to Disqualify Stovall &
 Associates [ECF No. 111] (“Defendant’s Motion for Sanctions”) and Motion for Leave to (i) File
 Under Seal Exhibits D, P and W to Defendant’s Motion for Sanctions; and (ii) Redact a Portion
 of the Motion [ECF No. 113]((Defendant’s Motion to Seal”); and an extension of the time in
 which to file Defendant’s Opposition to Plaintiff’s Motion for In Camera Review of the Football
 Leaks Documents to Determine Whether the Crime/Fraud Exception Applies (ECF No. 124]



1 ("Plaintiff's Motion for In Camera Review") as well as to extend the time for Plaintiff to file her
2 Reply in Support of same.

3 1. Defendant's Motion for Sanctions and Defendant's Motion to Seal were filed on
4 May 27, 2021, with Oppositions thereto originally due on June 10, 2021.

5 2. On June 10, 2021, Plaintiff filed a motion to extend time to respond to the Motion
6 for Sanctions and Motion to Seal until July 2021, which Defendant opposed. Plaintiff filed a
7 reply in support of the Motion to Extend Time on July 1, 2021. This Court has not yet ruled on
8 Plaintiff's Motion to Extend Time. However, on July 20, 2021, Plaintiff filed her
9 Responses/Oppositions to Defendant's Motion for Sanctions and Motion to Seal, making
10 Defendant's reply briefs in support of the same due on July 27, 2021.

11 3. On July 20, 2021, Plaintiff also filed her Motion for In Camera Review, making
12 Defendant's Opposition originally due on August 3, 2021.

13 4. Two of Defendant's lead lawyers are scheduled to be out of the jurisdiction from
14 July 30-August 7, 2021; and July 31-August 16, 2021, respectively.

15 5. Because of Counsel's travel plans, workload on other matters, and the gravity and
16 complexity of issues raised, additional time is necessary to file the subject Replies and
17 Opposition.

18 6. Accordingly, the Parties agree that the deadline for Defendant to file Reply Briefs
19 in Support of his Motion for Sanctions [ECF 111] and Motion to Seal [ECF. No. 113] shall be
20 extended from July 27, 2021 to August 13, 2021.

21 7. The Parties further agree that the deadline for Defendant to Oppose Plaintiff's
22 Motion for In Camera Review shall be extended from August 3, 2021 to August 18, 2021. The
23 deadline for Plaintiff's Reply in Support of the same shall be extended from August 25, 2021 to
24 September 1, 2021.

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1 8. The Parties stipulate good cause exists for the agreed upon extensions, which are
2 made in good faith and not for purposes of delay.

3 Respectfully Submitted this 27th day of July, 2021.

4 CHRISTIANSEN TRIAL LAWYERS

5
6 /s/ Kendelee L. Works, Esq.
7 PETER S. CHRISTIANSEN, ESQ.
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15 *Attorneys for Defendant Cristiano Ronaldo*

5 STOVALL & ASSOCIATES

6 /s/ Leslie M. Stovall, Esq.
7 LESLIE MARK STOVALL, ESQ.
8 Nevada Bar No. 2566
9 ROSS MOYNIHAN, ESQ.
10 Nevada Bar No. 11848
11 LARISSA DROHOBYCZER
12 Nevada Bar No. 12316
13 2301 Palomino Lane
14 Las Vegas, Nevada 89107
15 *Attorneys for Plaintiff Kathryn Mayorga*

16 **ORDER**

17 IT IS SO ORDERED.

18 DATED this 28th day of July, 2021.

19
20 
21 U. S. MAGISTRATE JUDGE



rom: Les Stovall <les@lesstovall.com>

Subject: RE: CR adv. Mayorga - draft SAO to extend time

Date: July 27, 2021 at 11:10:08 AM PDT

To: Kendelee Works <kworks@christiansenlaw.com>, Ross Moynihan <ross@lesstovall.com>

Cc: Maria Hernandez <maria@lesstovall.com>

Ms. Works – your stip and order did not provide time for me to reply to your opp for in camera review. You can file the proposed SAO with my signature with the understanding that when I receive the opp to the motion for in camera review I will need time to reply and will request a stip for that purpose, or you can add 14 days for reply to the proposed stip and order and file it with my e signature- ty/lms

From: Kendelee Works <kworks@christiansenlaw.com>

Sent: Tuesday, July 27, 2021 10:35 AM

To: Les Stovall <les@lesstovall.com>; Ross Moynihan <ross@lesstovall.com>

Cc: Maria Hernandez <maria@lesstovall.com>

Subject: Fwd: CR adv. Mayorga - draft SAO to extend time

Les/Ross,

Please let me know asap as today is the original deadline for the reply briefs.

Thank you,

KLW